

Brian C. Brook

From: Brian C. Brook
Sent: Tuesday, June 6, 2017 6:52 PM
To: Bauer, William G.; Keneally, Paul F.
Cc: rcalihan@calihanlaw.com
Subject: RE: Kleeberg v Eber - Rule 26(f) Comments?

Bill,

We're already a day late because of your request to have until today. I'm not sure what comments you intend to convey, but I intend to go ahead and file this tonight since I'm not going to be available tomorrow to do so. I'll wait until later tonight to give you more time if need be.

Brian

From: Bauer, William G. [mailto:wbauer@woodsoviatt.com]
Sent: Monday, June 5, 2017 12:43 PM
To: Keneally, Paul F. <PKeneally@underbergkessler.com>
Cc: Brian C. Brook <Brian@clintonbrook.com>; rcalihan@calihanlaw.com
Subject: Re: Kleeberg v Eber - Rule 26(f) Comments?

Brian I just finished up positions I need until tomorrow to give you any comments
Bill
Sent from my iPhone

William G. Bauer, Esq.
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Woods Oviatt Gilman LLP

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On Jun 5, 2017, at 12:38 PM, Keneally, Paul F. <PKeneally@underbergkessler.com> wrote:

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Ok by me.

<image001.jpg>
our most important partner is you®

Paul F. Keneally
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From: Brian C. Brook [<mailto:Brian@clintonbrook.com>]
Sent: Monday, June 05, 2017 10:22 AM
To: Bauer, William G. <wbauer@woodsoviatt.com>; 'rcalihan@calihanlaw.com' <rcalihan@calihanlaw.com>
Cc: Keneally, Paul F. <PKeneally@underbergkessler.com>
Subject: RE: Kleeberg v Eber - Rule 26(f) Comments?

Counsel,

Absent any comments received by early afternoon, I will interpret that as your consent to file this as is. The rules require that we file this by today, since it is 14 days after we held the conference.

The one wrinkle is signing it. I usually like to have everyone's signature (just the usual /s electronic signature), but I don't think that's necessary and obviously I won't do that without your explicit consent that I do so. So if you are able to get back to me one way or the other, I would appreciate it.

Thanks,

Brian

From: Brian C. Brook
Sent: Thursday, June 1, 2017 5:58 PM
To: Bauer, William G. <wbauer@woodsoviatt.com>; 'rcalihan@calihanlaw.com' <rcalihan@calihanlaw.com>
Cc: 'Keneally, Paul F.' <PKeneally@underbergkessler.com>
Subject: Kleeberg v Eber - Rule 26(f) Comments?

Bill and Rob,

Do you have any comments on the 26(f) discovery plan report? I'd like to get that finalized tomorrow if possible. Also, if you're going to notify the Court about the status of the probate proceedings, I would encourage you to do so soon. Are you still waiting for a final order or decree in that matter?

I've revised the attached to reflect Paul's edits.

Thanks,

Brian C. Brook | **Clinton Brook & Peed**
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